

HAGENS BERMAN SOBOL SHAPIRO LLP

Lauren Guth Barnes
Thomas M. Sobol
55 Cambridge Parkway, Suite 301
Cambridge, MA 02142
Tel: (617) 475-1957
lauren@hbsslaw.com
tom@hbsslaw.com

RAWLINGS & ASSOCIATES PLLC

Mark D. Fischer
One Eden Parkway
LaGrange, Kentucky 40031
Tel.: (502) 587-1279
Fax: (502) 584-8580
mdf@rawlingsandassociates.com

Counsel to Blue Cross Blue Shield Association

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re)	
)	Chapter 11
Purdue Pharma L.P., <i>et al.</i> , ¹)	
)	Case No. 19-23649 (RDD)
)	(Jointly Administered)
Debtors.)	
)	

**JOINDER OF THE BLUE CROSS AND BLUE SHIELD ASSOCIATION
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS'
OPPOSITION TO MOTIONS FOR STAY PENDING APPEAL**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717), and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901

The Blue Cross and Blue Shield Association (the “**BCBS Association**”), which represents Third-Party Payors (“**TPPs**”²) on the Official Committee of Unsecured Creditors (the “**Official Committee**”), by and through its undersigned co-counsel, joins the *Opposition of the Official Committee of Unsecured Creditors to Motions for Stay Pending Appeal* [ECF No. 4006] (the “**Opposition**”). For the reasons set forth in the Official Committee’s Opposition, the BCBS Association opposes each Stay Appellants’³ Motion to Stay pending appeal: (i) *Findings of Fact, Conclusions of Law, and Order Confirming the Twelfth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and Its Affiliated Debtors* [No. 3787] (the “**Confirmation Order**”), which approves the *Twelfth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and Its Affiliated Debtors* [ECF No. 3726] (the “**Plan**”); and (ii) *Order (I) Authorizing the Debtors to Fund Establishment of the Creditor Trusts, the Master Disbursement Trust and Topco, (II) Directing Prime Clerk LLC to Release Certain Protected Information, and (III) Granting Other Related Relief* [ECF No. 3773] (the “**Trust Advances Order**”).

WHEREFORE, the BCBS Association respectfully requests that the Court deny the Stay Appellants’ Motions to Stay its Confirmation Order and Trust Advances Order.

Dated: October 22, 2021
New York, New York

/s/ Lauren G. Barnes
HAGENS BERMAN SOBOL SHAPIRO LLP
Lauren Guth Barnes
Thomas M. Sobol
55 Cambridge Parkway, Suite 301
Cambridge, MA 02142
Tel: (617) 475-1957
lauren@hbsslaw.com
tom@hbsslaw.com

² Capitalized terms used and not defined herein have the terms ascribed to them in the Plan.

³ This Joinder adopts the definition of “Stay Appellant” set forth in the Official Committee’s Opposition.

RAWLINGS & ASSOCIATES PLLC

Mark D. Fischer

One Eden Parkway

LaGrange, Kentucky 40031

Tel.: (502) 587-1279

Fax: (502) 584-8580

mdf@rawlingsandassociates.com

Counsel to Blue Cross Blue Shield Association